

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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JONES, ET AL.,)	
)	
	Plaintiffs,)	
v.)	CIVIL ACTION
)	NO. 1:05-11832-DPW
CITY OF BOSTON, BOSTON POLICE)	
DEPARTMENT, ET AL.,)	
)	
	Defendants.)	
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MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Plaintiffs Ronnie Jones, et al., respectfully move this Court for leave to file documents in support of their Memorandum Of Law In Opposition To Defendants' Motion for Summary Judgment¹ under seal, including:

- (i) Independent Drug Test Results documents regarding Plaintiff Beckers [R.A. Ex. 42];
 - (ii) Independent Drug Test Results documents regarding Plaintiff Bridgeforth [R.A. Ex. 42];
 - (iii) Independent Drug Test Results documents regarding Plaintiff Bristow [R.A. Ex. 42];
 - (iv) Independent Drug Test Results documents regarding Plaintiff Couch [R.A. Ex. 42];
 - (v) Independent Drug Test Results documents regarding Plaintiff Downing [R.A. Ex. 42];
 - (vi) Independent Drug Test Results documents regarding Plaintiff Harris [R.A. Ex. 42];
 - (vii) Independent Drug Test Results documents regarding Plaintiff Hogan [R.A. Ex. 42];
 - (viii) Independent Drug Test Results documents regarding Plaintiff Jones [R.A. Ex. 42];
 - (ix) Independent Drug Test Results documents regarding Plaintiff Wade [R.A. Ex. 42];
- and

¹ Please note that hard copies of these documents were filed with the Court on December 18, 2014, as part of the Record Appendix. The exhibit numbers are noted below. Plaintiffs can provide additional copies of the documents in the Court so requests.

- (x) Independent Drug Test Results documents regarding Plaintiff Washington [R.A. Ex. 42];
- (xi) Transcript of testimony of Thomas Cairns, Ph.D., D.Sc., in the Matter of the Arbitration Between Boston Police Patrolmen's Association and City of Boston, dated February 25, 2005 [R.A. 61].

(collectively with the documents filed under seal by Defendants on December 11, 2014, the "Confidential Exhibits").

The Confidential Exhibits have been designated as "Highly Confidential" in discovery in this matter, and therefore should not be available for public viewing. Further, documents regarding the Plaintiffs' Independent Drug Test Results contain the Plaintiffs' personal identifying information and information relating to Plaintiffs' medical records. Therefore, in compliance with this Court's January 2007 Protective Order, the Confidential Exhibits should be filed under seal.

WHEREFORE, Plaintiffs respectfully requests that the Court grant leave to file under seal the Confidential Exhibits.

Respectfully submitted,

Plaintiffs, Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, Rachelle Couch, Keri Hogan, and the Massachusetts Association of Minority Law Enforcement Officers

By Their Attorneys,

/s/ John F. Adkins

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Dated: January 12, 2015

CERTIFICATE OF SERVICE

I, Laura Maslow-Armand, Esq., hereby certify that a true and correct copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 12, 2015.

/s/ John F. Adkins
John F. Adkins

CERTIFICATE OF SERVICE

I, Laura Maslow-Armand, Esq., hereby certify that a true and correct copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 12, 2015.

/s/ Laura Maslow-Armand

Laura Maslow-Armand, Esq.

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DISTRICT OF MASSACHUSETTS

RONNIE JONES, ET AL.,

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[PROPOSED] ORDER

Upon consideration of Plaintiff Motion for Leave to File Exhibits Under Seal,
Plaintiffs' Motion is hereby **GRANTED**.

SO ORDERED, this ____ day of _____, 2015.

The Honorable Douglas P. Woodlock, Jr.
United States District Court Judge